

JUDGE SCHEINDLIN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TUNG YEUNG LAM,

Defendant.

INDICTMENT

07 Cr.

FILED

SEP 06 2007

07 CRIM 844

COUNT ONE

The Grand Jury charges:

1. From at least in or about April 2007, up through and including on or about May 8, 2007, in the Southern District of New York and elsewhere, TUNG YEUNG LAM, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), by obtaining money and property from and with the consent of another person, to wit, an individual involved in the trafficking of counterfeit trademarked goods manufactured in China and distributed throughout the New York City area, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

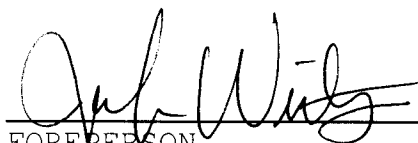
(Title 18, United States Code, Section 1951.)

COUNT TWO

The Grand Jury further charges:

2. From at least in or about April 2007, up through and including on or about May 8, 2007, in the Southern District of New York and elsewhere, TUNG YEUNG LAM, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did commit extortion, and did attempt to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), by obtaining money and property from and with the consent of another person, to wit, an individual involved in the trafficking of counterfeit trademarked goods manufactured in China and distributed throughout the New York City area (the "Victim"), which consent was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, LAM threatened to cause physical harm to the Victim if the Victim failed either to deliver a quantity of counterfeit shoes bearing the "Nike" trademark to him or to pay the value of these counterfeit shoes to him.

(Title 18, United States Code, Sections 1951 and 2.)



JOHN W. WILLIAMS
FOREPERSON



MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TUNG YEUNG LAM,

Defendant.

INDICTMENT

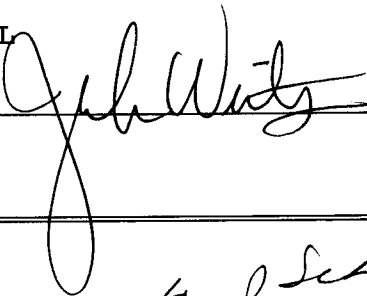
07 Cr. _____ (____)

(18 U.S.C. §§ 1951 and 2.)

MICHAEL J. GARCIA

United States Attorney.

A TRUE BILL



Foreperson.

Case assigned to J. Schendler

M. J. Hounstun

9/6/07
SS